

# EXHIBIT GG

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CHARLENE CARTER )  
)  
) CIVIL ACTION NO.  
VS. ) 3:17-CV-02278-X  
)  
SOUTHWEST AIRLINES CO., AND )  
TRANSPORT WORKERS UNION OF )  
AMERICA, LOCAL 556 )

-----  
CONFIDENTIAL  
TWU LOCAL 556 30(b)(6)  
ORAL DEPOSITION OF  
JESSICA PARKER  
NOVEMBER 30, 2020  
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ANSWERS AND DEPOSITION OF JESSICA PARKER,  
produced as a witness at the instance of the  
Plaintiff, taken in the above-styled and -numbered  
cause on NOVEMBER 30, 2020, at 4:13 p.m., before  
CHARIS M. HENDRICK, a Certified Shorthand Reporter  
in and for the State of Texas, witness located in  
Loveland, Colorado, pursuant to the Federal Rules  
of Civil Procedure, the current emergency order  
regarding the COVID-19 State of Disaster, and the  
provisions stated on the record or attached hereto.

1 A P P E A R A N C E S

2 FOR THE PLAINTIFF:

3 MR. MATTHEW B. GILLIAM  
4 NATIONAL RIGHT TO WORK LEGAL DEFENSE  
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17 FOR THE DEFENDANT, TRANSPORT WORKERS UNION OF  
18 AMERICA, LOCAL 556:

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20 MR. EDWARD B. CLOUTMAN, III  
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ALSO PRESENT: MS. CHARLENE CARTER  
MS. LAUREN ARMSTRONG

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Document 41

Exhibit 29 - .....17  
TWU Women Take Action Nationwide Article,  
Document 14

Exhibit 30 - .....30  
Facebook Posts TWU Local 556,  
Documents 25(a) & 25(b)

1 PROCEEDINGS

2 THE REPORTER: Today's date is  
3 November 30, 2020. The time is 4:13 p.m. This is  
4 the 30(b)(6) deposition of Jessica Parker, and it  
5 is being conducted remotely in accordance with the  
6 current emergency order regarding the COVID-19  
7 State of Disaster. The witness is located in  
8 Laughlin, Colorado.

9 My name is Charis Hendrick, Court  
10 Reporter, CSR No. 3469. I am administering the  
11 oath and reporting the deposition remotely by  
12 stenographic means from my home in Ellis County,  
13 Texas.

14 JESSICA PARKER,  
15 having been first duly sworn, testified as follows:

16 EXAMINATION

17 BY MR. GILLIAM:

18 Q. Good afternoon, Ms. Parker. Do you  
19 realize you are here today testifying on behalf of  
20 Local 556 and not in your personal capacity?

21 A. Yes.

22 Q. Okay. And prior to this deposition, did  
23 you review any documents in preparation?

24 A. No, I did not.

25 Q. Okay. And apart from legal counsel, did

1           A. No. Just for the -- just for the -- just  
2     for the meeting at TWU International.

3           Q. Okay. Now, prior to the event taking  
4     place, did -- did you ask Audrey Stone for  
5     authorization to organize the union's participation  
6     in the event?

7           A. I don't -- I don't know that I asked for  
8     her authorization. We arranged -- there was -- we  
9     arranged travel to and from. And I got approval  
10    that we could -- because we were facilitating a  
11    meeting while we were there, that we could use  
12    union business travel. And I -- I got approval for  
13    that, but I don't know -- I don't remember anything  
14    other than that.

15          Q. Okay. And you got the approval for union  
16    business travel from Audrey Stone?

17          A. I don't remember. I don't remember. I  
18    think I initially emailed John Parrott and he  
19    recommended that we check with Audrey, I believe is  
20    how that happened. It's been four years ago, so I  
21    don't remember exactly.

22          Q. Okay. And how many union members ended up  
23    attending the women's march?

24          A. I -- if memory serves, I believe we had  
25    28, but that is -- that is a rough guess. It's a

1 close guess, but it's --

2 Q. Okay. And did you decide who, I guess,  
3 you would invite to attend the march?

4 A. They were women who reached out that had  
5 been involved in our union that showed -- that  
6 expressed interest in going.

7 Q. Now, of the women who expressed interest  
8 in going, how did they learn that Local 556 was  
9 going to participate in a women's march?

10 A. I -- I don't recall how that all  
11 transpired.

12 Q. Okay. But the union members reached out  
13 to you personally or --

14 A. Some of them did, I think, but others were  
15 -- I -- I honestly don't remember how -- I -- I  
16 knew, of people who were going, there were several  
17 board members who went, so I -- I probably found  
18 out through some -- through -- through board  
19 members.

20 Q. Okay. And how -- do you know how they  
21 went about getting authorization to attend?

22 A. Well, there was no authorization to attend  
23 -- to attend the march. We had -- we had to  
24 arrange lodging. So, I guess, I don't understand  
25 what you are asking.

1 Q. Did -- did the union members who wanted to  
2 attend have to, I guess, request to be pulled in  
3 order to attend?

4 A. I believe there were a handful of trip  
5 pulls. I don't know how many. John Parrott would  
6 probably know that exactly because he handles the  
7 pulls.

8 Q. Okay. And who -- are there -- are there  
9 particular forms that have to be submitted in order  
10 to, I guess, to -- to be pulled?

11 A. If memory serves, most people arrange --  
12 either already were off of work or arranged to be  
13 off of work. I -- I believe I submitted a handful  
14 of people to -- I am assuming JP, with their trip,  
15 their pairing number and the dates if it needed to  
16 be pulled.

17 Q. Okay. And when you say you submitted a  
18 handful of people, did you submit particular forms?

19 A. I -- at that time, our -- the way we have  
20 done things, I believe, has changed since then. I  
21 think I just emailed him names, employee numbers,  
22 pairing number and dates.

23 Q. Okay. Let's see. If I could have you  
24 look at Document 41. We will mark this as, I  
25 guess, Exhibit 28; is that where we are?



1 paragraph?

2 Q. It's the one that starts, the WWC meeting  
3 started with an all-day intensive how-to-lobby  
4 session.

5 A. Yes.

6 Q. Okay. And did the Local 556 members  
7 attend that meeting during the week of the women's  
8 march?

9 A. I am not sure what this -- because we  
10 spoke about the Pregnant Women's Fairness Act at  
11 the meeting. Is this -- I don't know if this is  
12 referring to --

13 Q. It says, the WWC meeting started with an  
14 all-day intensive how-to-lobby session facilitated  
15 by WWC chair and TWU political field representative  
16 Gwen York.

17 A. Okay. But it talks about -- prior to  
18 that, it talks about TWU International's working  
19 women's committee meeting held thrice yearly; that  
20 -- that was not the -- so I don't know if it's  
21 referring to that meeting or if it's referring to  
22 the meeting that we had on the 19th. And so --  
23 because I haven't read through this entire article,  
24 I believe that that is -- that's referring to the  
25 -- to the meeting held February 28th through March

1 A. That says -- I am sorry, what?

2 Q. Carter 1144.

3 A. I don't -- are we on 25?

4 MR. GREENFIELD: 25-A, Ms. Parker. It  
5 will be the second document on the second page on  
6 25-A.

7 A. Okay. I am on 25-A and I don't see --

8 Q. (By Mr. Gilliam) Really small letters in  
9 the bottom right-hand corner.

10 A. Okay. I --

11 Q. You found it?

12 A. It says Carter 1163?

13 Q. Do you see one that says 1144?

14 A. 1150 -- I think --

15 Q. It should be the second page.

16 A. Okay. Carter 1144. Sorry. It's tiny.

17 Q. No, yeah, yeah, it is very small, so, no.

18 And do you know who [REDACTED] is?

19 A. I do.

20 Q. Okay. And who is she?

21 A. She's a flight attendant and a member of  
22 Local 556.

23 Q. Okay. Is she a member of the working  
24 women's committee?

25 A. Yes.

1 Q. Okay. And is she the person carrying the  
2 sign in that picture?

3 A. Yes.

4 Q. Okay. And let's see. Going to the next  
5 page. And do you recognize any union members in  
6 this picture?

7 A. Yes.

8 Q. Okay. And who are the union members you  
9 recognize in this picture?

10 A. The far left, I believe, is [REDACTED]  
11 [REDACTED]. On the top of [REDACTED] shoulder is  
12 Audrey Stone. [REDACTED] is next. I don't know  
13 who the male is. And -- but then -- I don't -- I  
14 don't know who that is.

15 Q. Okay.

16 A. And then it's [REDACTED] on the far  
17 right.

18 Q. Okay. And do you recognize this banner  
19 being carried here?

20 A. Yes.

21 Q. Okay. And where did the banner come from?

22 A. I believe we had it made prior to the  
23 march.

24 Q. Okay. And let's see. Let me see. If I  
25 can direct you to the next page too.

1 A. Okay.

2 Q. This one -- this is the one that says  
3 Carter 1147 at the bottom?

4 A. Yes.

5 Q. Okay. And this picture here, was this  
6 posted on TWU Local 556's page?

7 A. This is -- I believe this may be from the  
8 Facebook page, but it -- it may have been also  
9 posted on the website. I don't know; I think it  
10 was.

11 Q. Okay. And did you share it on your  
12 Facebook page?

13 A. I don't remember.

14 Q. Okay. And up at the top, it says, Jessica  
15 Parker shared TWU Local 556's video; and it says,  
16 why we marched.

17 Does that --

18 A. I didn't remember sharing it. I didn't  
19 remember sharing it.

20 Q. Okay. And then if we could go to the next  
21 page.

22 A. Okay.

23 Q. And was this a -- also a picture you  
24 posted on your Facebook page?

25 A. Yes. It looks like it.

1 Q. Okay. And all of the women pictured  
2 there, are they Local 556 members?

3 A. Yes.

4 Q. Okay. All right. And do you know who  
5 [REDACTED] is?

6 A. Yes. [REDACTED]

7 Q. Okay. And is she also a Southwest flight  
8 attendant?

9 A. At the time, she was. She's retired.

10 Q. Okay. Was she also a member of the WISE  
11 committee?

12 A. Yes.

13 Q. Okay. And she attended the march?

14 A. She did, yes.

15 Q. Okay. Do you know who [REDACTED] is?

16 A. Yes.

17 Q. Okay. Is she also a flight attendant?

18 A. She is, yes.

19 Q. Okay. And did she also attend the women's  
20 march with Local 556?

21 A. She did, yes.

22 Q. Okay. All right. Now, at any point, did  
23 you learn about the Facebook posts and messages  
24 that Charlene Carter sent to Audrey Stone?

25 A. I knew something had been sent to Audrey

1 I, JESSICA PARKER, have read the foregoing  
2 deposition and hereby affix my signature that same  
3 is true and correct, except as noted above.

4  
5 \_\_\_\_\_  
6 JESSICA PARKER

7 THE STATE OF \_\_\_\_\_  
8 COUNTY OF \_\_\_\_\_

9 Before me, \_\_\_\_\_, on this day  
10 personally appeared JESSICA PARKER, known to me (or  
11 proved to me under oath or through \_\_\_\_\_) to  
12 be the person whose name is subscribed to the  
13 foregoing instrument and acknowledged to me that  
14 they executed the same for the purposes and  
15 consideration therein expressed.

16  
17 Given under my hand and seal of office this \_\_\_\_\_  
18 day of \_\_\_\_\_, 2020.

19  
20 \_\_\_\_\_  
21 NOTARY PUBLIC IN AND FOR THE  
22 STATE OF \_\_\_\_\_

23  
24 MY COMMISSION EXPIRES: \_\_\_\_\_  
25

1 REPORTER'S CERTIFICATION  
2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE NORTHERN DISTRICT OF TEXAS  
4 DALLAS DIVISION  
5 CHARLENE CARTER )  
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9 -----  
10 CONFIDENTIAL  
11 TWU LOCAL 556 30(b)(6)  
12 ORAL DEPOSITION OF  
13 JESSICA PARKER  
14 NOVEMBER 30, 2020  
15 -----

16 I, CHARIS M. HENDRICK, Certified Shorthand  
17 Reporter in and for the State of Texas, do hereby  
18 certify to the following:

19 That the witness, JESSICA PARKER, was by  
20 me duly sworn and that the transcript of the oral  
21 deposition is a true record of the testimony given  
22 by the witness.

23 I further certify that pursuant to Federal  
24 Rules of Civil Procedure, Rule 30(e)(1)(A) and (B)  
25 as well as Rule 30(e)(2), that review of the  
transcript and signature of the deponent:

1       \_\_xx\_\_ was requested by the deponent and/or a  
2 party before completion of the deposition.

3       \_\_\_\_\_ was not requested by the deponent and/or  
4 a party before the completion of the deposition.

5           I further certify that I am neither  
6 attorney nor counsel for, nor related to or  
7 employed by any of the parties to the action in  
8 which this deposition is taken and further that I  
9 am not a relative or employee of any attorney of  
10 record in this cause, nor am I financially or  
11 otherwise interested in the outcome of the action.

12           The amount of time used by each party at  
13 the deposition is as follows:

14           Mr. Gilliam - 50 minutes

15  
16           Subscribed and sworn to on this 8th day of  
17 December, 2020.

18

19

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25

*Charis M Hendrick*

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